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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HOBOKEN HOLDINGS, L.P.,

Plaintiff,

v.

ZORY CORT LLC (f/k/a SEG CORT LLC),
ZORY GROUP, INC. (f/k/a STEINER
EDUCATION GROUP, INC.), STEINER
LEISURE LIMITED (also known as NEMO
MERGER SUB, INC.), NEMO PARENT,
INC., NEMO INVESTOR AGGREGATOR,
LIMITED, CATTERTON MANAGEMENT
COMPANY, L.L.C., d/b/a L CATTERTON,
JOHN DOE COMPANIES 1-10, fictitious
names of companies to be named in this action,
and JOHN DOE INDIVIDUALS 1-10,
fictitious names of individuals to be named in
this action,

Defendants.

Case No. 2:20-cv-01268

ECF Case

Removed from:

Superior Court of New Jersey
Law Division: Hudson County
Docket No. HUD-L-000002-20

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, *et seq.*, defendants Steiner Leisure Limited; Nemo Parent, Inc.; Nemo Investor Aggregator, Limited; and Catterton Management

Company, L.L.C. (collectively, the “Removal Defendants”), by their undersigned counsel, hereby remove the above-captioned civil action, and all claims and causes of action therein (the “New Jersey Action”), from the Superior Court of the State of New Jersey, Law Division, Hudson County, to the United States District Court for the District of New Jersey. As grounds for removal, the Removal Defendants state as follows:

1. The Complaint states that Plaintiff seeks money damages in excess of five hundred thousand dollars (\$500,000).

2. Defendants Nemo Parent, Inc.; Nemo Investor Aggregator, Limited; and Catterton Management Company, L.L.C. were served with a copy of the Summons and Complaint in the above-captioned action (the “Complaint”) on January 8, 2020. Defendant Steiner Leisure Limited was served with a copy of the Complaint on January 9, 2020. Accordingly, removal is timely pursuant to 28 U.S.C. § 1446(b) because this Notice of Removal is being filed within thirty (30) days of the Removal Defendants’ receipt of the Complaint. A true and correct copy of the Complaint is attached hereto as Exhibit A.

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 based on diversity of citizenship because there is complete diversity between the Plaintiff and the Defendants and the amount in controversy exceeds \$75,000.

4. Defendant Steiner Leisure Limited is an international business company incorporated under the laws of the Bahamas with a principal place of business in the Bahamas.

5. Defendant Nemo Parent, Inc. is an international business company incorporated under the laws of the Bahamas with a principal place of business in the Bahamas.

6. Defendant Nemo Investor Aggregator, Limited is an exempted company incorporated under the laws of the Cayman Islands with a principal place of business in the Cayman Islands.

7. Defendant Catterton Management Company, L.L.C. is a Delaware limited liability company. Its sole member is *L* Catterton Management, Ltd., a corporation incorporated under the laws of England with a principal place of business in Connecticut.

8. Defendant Zory Cort LLC is a Florida limited liability company. Its sole member is Zory Group, Inc., a Florida corporation with a principal place of business in Florida.

9. In accordance with 28 U.S.C. § 1446(b)(2)(A), all defendants consent to removal of this action to the United States District Court for the District of New Jersey. Defendants Zory Cort LLC and Zory Group, Inc.'s written consent to removal is attached hereto as Exhibit B.

10. On information and belief, Plaintiff Hoboken Holdings, L.P. is a Delaware limited partnership. Its general partner is HBK Holdings Corp., a Delaware corporation with a principal place of business in New York.

11. On information and belief, no partner of Plaintiff Hoboken Holdings, L.P. is a citizen of the Bahamas, the Cayman Islands, England, Connecticut, or Florida.

12. The amount in controversy is in excess of \$75,000, as the Complaint alleges damages in excess of five hundred thousand dollars (\$500,000).

13. In accordance with 28 U.S.C. § 1446(a), true and correct copies of all process, pleadings, and orders served upon the Removal Defendants in the New Jersey Action are attached hereto. *See* Exhibit A.

14. Pursuant to 28 U.S.C. § 1446(d), and promptly after this Notice of Removal is filed, the Removal Defendants will give written notice of the removal of the New Jersey Action to Plaintiff's counsel and will file a copy of the Notice of Removal with the Clerk of the Superior Court of the State of New Jersey, Law Division, Hudson County.

15. In accordance with 28 U.S.C. § 1446(a), this Notice of Removal is signed pursuant to Federal Rule of Civil Procedure 11.

WHEREFORE, this action should proceed in the United States District Court for the District of New Jersey, as an action properly removed thereto.

DEFENDANTS STEINER LEISURE LIMITED; NEMO PARENT, INC.; NEMO INVESTOR AGGREGATOR, LIMITED; AND CATTERTON MANAGEMENT COMPANY, L.L.C.

Dated: February 6, 2020

By: /s/ Martin B. Gandelman
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CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was duly served on opposing counsel by sending a copy by Federal Express to the following on this, the 6th day of February, 2020:

Michael R. Yellin, Esq.
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